

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

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DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

October 28, 1982

CERTIFIED MAIL

Mr. Ray Strother,
Facilities Engineer
Chrysler Corporation
Warren Stamping Plant
22800 Mound Road
Warren, Michigan 48091

Dear Mr. Strother:

On September 27, 1982, I inspected your plant for compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 as amended. A copy of my report is enclosed for your use and distribution to appropriate personnel.

A few deficiencies were noted as follows:

1. Personnel training was not conducted by the May 19, 1981 deadline required by 40 CFR 262.34(9)5 which requires compliance with 40 CFR 265.16.
2. Your contingency plan does not include actions personnel must take to comply with 265.51 and 265.56 in response to fires or explosions. Only spills are covered.
3. The listing of personnel qualifies to act as emergency coordinator was not up-to-date due to personnel changes at the plant. This is contrary to the requirements of 265.52(d). Home phones and addresses should also be listed.
4. Arrangements with local authorities were not addressed in the contingency plan, according to the requirements of 40 CFR 265.52(c).

Please respond in writing by November 30, 1982 detailing actions taken to correct the last three.



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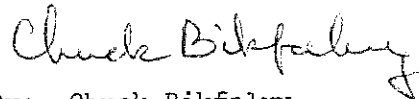
Mr. Ray Strother
October 28, 1982
Page 2

Until then, if you have any questions or concerns about the inspection,
please do not hesitate to call me at (313) 675-0860.

Sincerely,

WATER QUALITY DIVISION

Roy E. Schrameck, P.E.
District Engineer

A handwritten signature in cursive script, appearing to read "Chuck Bikfalvy".

By: Chuck Bikfalvy
Water Quality Specialist

RES:CB/sc

Enclosure

cc: Al Howard, OHWM (2)
files

#1120

RCRA Inspection Report

EPA Identification Number: M I T 270010655
Installation Name: CHRYSLER CORP. WARREN STAMPING PLANT
Location Address: 22800 MOUND RD.
City: WARREN State: MI 48091
Date of inspection: 9/27/82 Time of inspection (from) 9:15 (to) 12:00

Person(s) interviewed	Title	Telephone
<u>RAY STROTHER</u>	<u>FAC. ENGINEER</u>	<u>(313) 497-3663</u>
<u>STEVE LEPKOWSKI</u>	<u>FOREMAN-BYPRODUCTS</u>	<u>(313) 497-3727</u>
<u>BOB LASSEN</u>	<u>HAZ. WASTE COORD.</u>	<u>(313) 497-3727</u>
<u>R. DEWEY MAHRLE</u>	<u>MGR-FAC. ENGINEERING</u>	<u>(313) 497-3660</u>
Inspector(s)	Agency/Title	Telephone
<u>C. BIKPALY</u>	<u>MNR / WQS</u>	<u>(313) 675-0860</u>

Installation Activity (mark only one box) Inspection Form(s)

- | | |
|--|------|
| <input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input checked="" type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

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INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>76</u>				ALL WERE NON HAZARDOUS WASTE (ACT 136) SHIPMENTS
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID number of transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

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Section C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(3) If required, are placards available to transporter? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**** (4) Pre-shipment Accumulation:**

**** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.**

a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i. Is each container clearly marked with the date on which the period of accumulation began?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	NONE ON SITE
ii. Have more than 90 days elapsed since the dates marked?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
iv. Are containers in good condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
v. Are containers compatible with waste in them?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
vi. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	AREA IS DIKED, RUNOFF COLLECTED
vii. Are containers stored closed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
viii. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DAILY + WEEKLY
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IGNITABLE

	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			✓	NA - NO INCOMPATIBLE WASTES
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			✓	NA
b. Is hazardous waste accumulated in tanks? If no, skip to c. 265.34 (January 11, 1982 revision)			✓	
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 265.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers? _____ ☒

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- | | | | |
|---|-------------------------------------|-------------------------------------|--|
| i. Job Titles? | <input checked="" type="checkbox"/> | _____ | CODE NUMBERS
IDENTIFY PERSONNEL
TITLES + JOBS IN
PERSONNEL DEPT |
| ii. Job Descriptions? | <input checked="" type="checkbox"/> | _____ | |
| iii. Description of training? | <input checked="" type="checkbox"/> | _____ | |
| iv. Records of training? | <input checked="" type="checkbox"/> | _____ | |
| v. Did personnel receive the required training by 5-19-81? | | <input checked="" type="checkbox"/> | |
| vi. Do new personnel receive required training within six months? | <input checked="" type="checkbox"/> | _____ | |
| vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training? | | <input checked="" type="checkbox"/> | 1ST SESSION
LESS THAN 1 YEAR
AGO |

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 264.31 _____ ☒

INTEND TO ANNUALLY REVIEW..

	Yes	No	NI	Remarks
ii. If required, does this facility have the following equipment: 264.32				
Internal communications or alarm systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PAGING SYSTEM, PHONES, 2-WAY RADIOS
Telephone or 2-way Radios at the scene of operations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	" "
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Indicate the volume of water and/or foam available for fire control:

200,000 GALLON TANK AND CITY WATER
PLUS FOAM (QUANTITY NOT INSPECTED)

iii. Testing and Maintenance of Emergency Equipment: 264.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DONE BY PLANT FIRE DEPT
Is emergency equipment maintained in operable condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
v. Is there adequate aisle space for unobstructed movement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DIRECT LINE TO FIRE DEPT., BLANKET CONTRACT WITH SPILL CONTRACTOR

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	BUT NOT COMPLETE, DOES NOT INCLUDE FIRES + EXPLOSION! ONLY SPILLS
--	-------------------------------------	--------------------------	--------------------------	--

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?		✓		
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			HOME PHONES & ADDRESSES AVAIL. FROM PLANT PROTECTION
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			EMERGENCY TRAILER
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)			✓	NOT REQUIRED FOR HAZARDOUS WASTE PAD
vi. Are copies of the Contingency Plan available at site and local emergency organizations?			✓	COULD NOT ANSWER
vii. Is the facility emergency coordinator identified?	✓			CHAIN OF COMMAND CHART (NEEDS UPDATING)
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?			✓	NA- NO EMERGENCY EXCEPT SPILL OF NON-HAZARDOUS WASTE (OIL)

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

☒ ☐ ☐ LEFT PERMANENTLY

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)

262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

☐ ☒ ☐ ☐

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

☐ ☐ ☐ ☐

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

☐ ☐ ☐ ☐

iii. Met the Manifest requirements?

☐ ☐ ☐ ☐

b. Importing Hazardous Waste, has the generator met the manifest requirements?

☐ ☐ ☐ ☐

Remarks: COMPANY CAN QUALIFY AS A SMALL
QUANTITY GENERATOR

SPEC PLAN NEEDS TO BE UPDATED TO INCLUDE
RCRA REQUIREMENTS